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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNIVERSAL OPERATIONS RISK
MANAGEMENT, LLC, EDWARD
MUHLNER, THOMAS BOCHNOWSKI,
and MARK COHON,

Plaintiffs,

v.

GLOBAL RESCUE LLC, and DOES 1
through 10, inclusive,

Defendants.

CASE NO. 11-CV-05969 SBA

**JOINT STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO RESPOND TO
DEFENDANT'S NOTICE OF MOTION,
MOTION AND AMENDED MEMORANDUM IN
SUPPORT OF GLOBAL RESCUE LLC'S
MOTION TO DISMISS, TRANSFER, OR STAY**

Date: April 10, 2012

Time: 1:00 p.m.

Place: Courtroom 1

Judge: Honorable Sandra B. Armstrong

**TO THE HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

WHEREAS, Plaintiffs served their First Amended Complaint in this matter on November 8, 2011;

WHEREAS, Defendants filed their Notice of Removal in this Court on December 5, 2011;

WHEREAS, Defendant filed its Motion to Dismiss, Transfer, or Stay before Magistrate Judge Donna M. Ryu on December 12, 2011;

WHEREAS, this action, *Universal Operations Risk Management, LLC et al. v. Global Rescue LLC et al.*, Case No. 11-CV-05969, was reassigned to the Honorable Sandra B. Armstrong for all further proceedings on December 13, 2011;

WHEREAS, per the December 13, 2011 Reassignment Order from the Office of the Clerk of Court, Defendant filed its Re-Notice of Motion, Motion and Amended Memorandum in Support of Global rescue LLC's Motion to Dismiss, Transfer, or Stay ("the Motion") before the Honorable Sandra B. Armstrong on December 16, 2011;

WHEREAS, the Court's first available hearing date is April 10, 2012;

WHEREAS, there have been no prior requests to extend any deadlines and such a request is made: (1) to remove any arguable requirement for Plaintiffs to respond in a California court in violation of the Temporary Restraining Order issued by the Superior Court of the Commonwealth of Massachusetts, Suffolk, Case No. 11-4502G (and which action has subsequently been removed to and is pending before the U.S. District court for the District of Massachusetts, No. 1:11-civ-12250 (Wolf, C.J.)), which currently prohibits Plaintiffs Muhlner, Bochnowski and Cohon from prosecuting their claims, prosecuting a separate suit, or obtaining relief in any other court except a Massachusetts state or federal court, and specifically prohibits them from prosecuting a separate suit in any state and federal court of California; (2) based on Plaintiffs' counsel's request to alleviate any requirement that Plaintiffs' counsel brief and respond to Defendant's Motion during the upcoming holidays, including during pre-scheduled holiday vacation time with family, and; (3) for good cause and not for any purposes of delay on either party's part.

1 It is therefore agreed to and stipulated by and between the parties and their respective counsel
2 that an extension of deadlines is warranted and the revised schedule shall be as follows:

3 1. Opposition to Defendant's Re-Notice of Motion re Motion to Dismiss, Transfer or
4 Stay is due January 24, 2012.

5 2. Reply to Plaintiffs' Opposition to Defendant's Re-Notice of Motion re Motion to
6 Dismiss, Transfer or Stay is due January 31, 2012.

7
8 **Stipulated By and Between:**

9 Dated: December 22, 2011

Respectfully submitted,
Valdez Seyedin-Noor Dunson & Doyle LLP

11 By: /s/ Amy K. Todd
12 Amy K. Todd (SBN 208581)

13 Of counsel, *Pro Hac Vice Application Pending*:
14 Mark M. Whitney, Mass. BBO #637054
MORGAN, BROWN & JOY, LLP


15 Dated: December 22, 2011

Respectfully submitted,
Greenberg Traurig, LLP

17 By: /s/ Todd R. Wulffson
18 Todd R. Wulffson (SBN 150377)

21 PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

23 Dated: 12/27/11

24 
The Honorable Sandra B. Armstrong
United States District Judge